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February 6, 2019

By ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ***Iowa Network Access Division Tariff F.C.C. No. 1, WC Docket No. 18-60,***
Transmittal No. 38

Dear Ms. Dortch:

On February 5, 2019, Christi Shewman of AT&T Services, Inc. (“AT&T”), Jim Bendernagel of Sidley Austin LLP, and Brian Pitkin of FTI Consulting, met in person with FCC staff to discuss the Commission’s ongoing investigation of the tariff submitted on September 24, 2018 by Iowa Network Services, Inc. d/b/a Aureon Network Services (“Aureon”). The following staff members from the Wireline Competition Bureau were present: Gil Strobel, Victoria Goldberg, Edward Krachmer, and Christopher Koves. Also present from the FCC’s Office of Economics & Analysis was Richard Kwiatkowski.

The purpose of the meeting was to present information in response to Aureon’s Second Direct Case, Rebuttal, and ex parte submissions. AT&T’s presentation focused primarily on Aureon’s over-allocation of cable & wire facilities costs to its centralized equal access service, as well as it proposed switch investment. AT&T also presented information on the discrepancies in Aureon’s circuit data, and the impact of Aureon’s third-party lease data on its fair market value calculation.

The materials that AT&T presented to Commission staff contain Confidential and Highly Confidential Information that is covered by the Commission’s March 26, 2018 Protective Order entered in this proceeding, as well as the protective order entered by the Commission in the formal complaint proceeding between AT&T and Aureon. Consistent with the Commission’s rules, AT&T is filing electronically this **Public Version** of its submission that does not contain any Confidential Information, and it has submitted a **Confidential Version** to the Secretary’s office that includes copies of these materials.

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Please contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "James F. Bendoragel, Jr.", with a stylized flourish at the end.

James F. Bendoragel, Jr.

Cc: James L. Troup, Counsel for Aureon
Tony Lee, Counsel for Aureon
Gil Strobel
Victoria Goldberg
Edward Krachmer
Christopher Koves
Richard Kwiatkowski
Joseph Price